

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
JANE DOE,

Plaintiff,

v.

**20-cv-00484-JGK**

DARREN K. INDYKE and RICHARD D.  
KAHN, in their capacities as executors of  
the ESTATE OF JEFFREY E. EPSTEIN,  
GHISLAINE MAXWELL, an individual,

Defendants.  
-----X

**DEFENDANT GHISLAINE MAXWELL'S NOTICE OF APPLICATION  
FOR COSTS SOUGHT AGAINST PLAINTIFF**

PLEASE TAKE NOTICE that, upon Defendant Ghislaine Maxwell's Bill of Costs, the exhibits annexed thereto, the Affidavit of Laura A. Menninger dated May 11, 2021, and all other pleadings and proceedings herein, the Defendant will move this Court before the Orders and Judgment Clerk, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, Room 250, New York, NY 10007 on May 26, 2021 at 11:30 am, or as soon thereafter as counsel may be heard, at a time and date to be determined as convenient for the Court, for an order pursuant to Rule 54 of the Fed. R. Civ. P., Local Civil Rule 54.1, and 28 U.S.C. §§ 1920 and 1923, granting fees and costs sought by Ms. Maxwell and granting such other relief that this Court deems proper.

Dated: May 11, 2021  
New York, New York

Respectfully submitted,

*s/ Laura A. Menninger*

---

Laura A. Menninger (LM-1374)  
HADDON, MORGAN AND FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, CO 80203  
Phone: 303.831.7364  
Fax: 303.832.2628  
lmenninger@hmflaw.com

*Attorneys for Ghislaine Maxwell*

**CERTIFICATE OF SERVICE**

I certify that on May 11, 2021, I electronically filed the foregoing *Defendant Ghislaine Maxwell's Notice of Application for Costs Sought Against Plaintiff* on with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Kevin Boyle  
Robert Glassman  
Panish, Shea & Boyle  
11111 Santa Monica Blvd., Ste 700  
Los Angeles, CA 90025  
boyle@psblaw.com  
glassman@psblaw.com

Bennet J. Moskowitz  
Charles L. Glover  
Mary Grace W. Metcalfe  
Troutman Pepper Hamilton Sanders LLP  
875 Third Avenue  
New York, NY 10022  
bennet.moskowitz@troutman.com  
charles.glover@troutman.com  
marygrace.metcalfe@troutman.com

Molly S. DiRago  
Troutman Pepper Hamilton Sanders LLP  
227 W. Monroe Street, Suite 3900  
Chicago, IL 60606  
molly.dirago@troutman.com

*s/ Nicole Simmons*

---